

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

TERESITA VIDELA,	:	
	:	
Plaintiff,	:	NOTICE OF REMOVAL FROM
	:	THE CIRCUIT COURT FOR
	:	MONTGOMERY COUNTY,
v.	:	MARYLAND,
	:	CASE NO.: 485103-V
ROSS STORES, INC.,	:	CIVIL ACTION NO.
	:	
Defendant.	:	

PETITION FOR REMOVAL

Pursuant to 28 U.S.C., Section 1441(a), the Defendant, Ross Stores, Inc., respectively, notices the removal of the above-captioned matter to this Honorable Court from the Circuit Court for Montgomery County, Maryland, based on diversity of citizenship, and as grounds therefor, states as follows:

1. On or about March 15, 2021, the Plaintiff, Teresita Videla, filed the Complaint, attached as Exhibit A, in the Circuit Court for Montgomery County, Maryland.

2. On or about April 27, 2021, the Plaintiff served the Defendant copies of the Summons served on this Defendant, attached as Exhibit B.

3. This Notice of Removal was timely filed, as it is filed within thirty (30) days of service and within one year of filing of the Complaint.

4. Pursuant to 28 U.S.C., Section 1441 and 1332, complete diversity of citizenship is established as follows:

- Plaintiff is a resident of Maryland.
- The Defendant, Ross Stores, Inc., has it's principal place of business in

Newark, CA.

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5. As this is a civil action wherein the amount in controversy exceeds \$75,000.00, exclusive of interests and costs, this Honorable Court has diversity jurisdiction over this matter pursuant to 28 U.S.C., Section 1332.

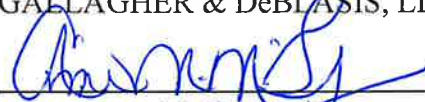
6. By reason of the foregoing, removal is proper pursuant to 28 U.S.C., Section 1441.

7. A copy of the Notice of Removal filed with the Circuit Court for Montgomery County, Maryland is attached as Exhibit C.

8. The Petitioner presents \$402.00 by electronic payment, as required by the law.

WHEREFORE, the Defendant, Ross Stores, Inc., respectively, requests to remove this action from the Circuit Court for Montgomery County, Maryland to the United States District Court for the District of Maryland.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of May 2021, a copy of the foregoing was forwarded electronically, and via First Class Mail, postage prepaid to:

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